

KAREN A. CONNOLLY, LTD.

Karen A. Connolly  
6600 W. Charleston Blvd., Ste. 124, Las Vegas, Nevada 89146  
Telephone: (702) 678-6700 Facsimile: (702) 678-6767

1 KAREN A. CONNOLLY  
2 **KAREN A. CONNOLLY, LTD.**  
3 6600 W. Charleston Blvd., Ste. 124  
4 Las Vegas, NV 89146  
5 Telephone: (702) 678-6700  
6 Facsimile: (702) 678-6767  
7 E-Mail: [advocate@kconnollylawyers.com](mailto:advocate@kconnollylawyers.com)  
8 *Attorney for Defendant, Jan Rouven Fuechtener*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 JAN ROUVEN FUECHTENER,

12 Defendant.

CASE NO.: 2:16-CR-100-GMN-CWH

**STIPULATION TO CONTINUE  
SENTENCING HEARING**

13 IT IS HEREBY STIPULATED AND AGREED, by and between Elham Roohani and Lisa  
14 C. Cartier-Giroux, Assistant United States Attorneys, counsel for the United States of America, and  
15 Karen A. Connolly, counsel for Defendant JAN ROUVEN FUECHTENER, that the sentencing  
16 hearing currently scheduled for June 30, 2017, at the hour of 10:30 a.m., be vacated and continued  
17 for approximately 30 days, but not between July 10-14, July 28-August 10, or August 24-25.

18 This Stipulation is entered into for the following reasons:

19 1. The parties agree to the continuance for the following reasons: Defendant is filing  
20 a motion to withdraw the guilty plea agreement; on June 2, 2017 a *Report &*  
21 *Recommendation* was filed by the magistrate recommending that the sentencing hearing be  
22 continued to allow for sufficient time for briefing, an evidentiary hearing, and a subsequent  
23 report and recommendation on the ownership and control of the \$975,300 proceeds from the  
24 sale of a residence at 7080 Donald Nelson Avenue, Las Vegas, NV 89131. The hearing has  
25 been set for July 6, 2017.

26 2. The additional time requested herein is not sought for purposes of delay.

27 ///

28 ///

KAREN A. CONNOLLY, LTD.

Karen A. Connolly  
6600 W. Charleston Blvd., Ste. 124, Las Vegas, Nevada 89146  
Telephone: (702) 678-6700 Facsimile: (702) 678-6767

1 3. Additionally, denial of this request for continuance could result in a miscarriage of  
2 justice.

3 4. This is the third request to continue the sentencing date.

4 DATED this 16<sup>th</sup> day of June, 2017.

5 KAREN A. CONNOLLY, LTD.

DANIEL G. BOGDEN  
United States of America

6  
7 /s/ Karen A. Connolly

KAREN A. CONNOLLY

8 Counsel for Jan Rouven Fuechtener

/s/ Elham Roohani

ELHAM ROOHANI

LISA C. CARTIER-GIROUX

Assistant United States Attorneys

Counsel for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAN ROUVEN FUECHTENER,

Defendant.

CASE NO.: 2:16-cr-100-GMN-CWH

**FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER**

**FINDINGS OF FACT**

Based on the Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The parties agree to the continuance for the following reasons: Defendant is filing a motion to withdraw the plea agreement; on June 2, 2017 a *Report & Recommendation* was filed by the magistrate recommending that the sentencing hearing be continued to allow for sufficient time for briefing, an evidentiary hearing, and a subsequent report and recommendation on the ownership and control of the \$975,300 proceeds from the sale of a residence at 7080 Donald Nelson Avenue, Las Vegas, NV 89131. The hearing has been set for July 6, 2017.

2. The additional time requested herein is not sought for purposes of delay.

3. Additionally, denial of this request for continuance could result in a miscarriage of justice.

4. This is the third request to continue the sentencing date.

For all of the above-stated reasons, the ends of justice would best be served by a continuance of the sentencing.

**CONCLUSIONS OF LAW**

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking

///

1 into account the exercise of due diligence.

2 The continuance sought herein is excusable under the Speedy Trial Act, title 18, United States  
3 Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section  
4 3161(h)(7)(B(i), (iv).

5 **ORDER**

6 IT IS THEREFORE ORDERED that the Sentencing Hearing currently scheduled for June  
7 30, 2017, at the hour of 10:30 a.m., be vacated and set continued to \_\_\_\_\_ at  
8 the hour of \_\_\_\_\_.m.

9 DATED this \_\_\_\_\_ day of June 2017.

10  
11 UNITED STATES DISTRICT JUDGE  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

KAREN A. CONNOLLY, LTD.  
Karen A. Connolly  
6600 W. Charleston Blvd., Ste. 124, Las Vegas, Nevada 89146  
Telephone: (702) 678-6700 Facsimile: (702) 678-6767